

With regard to the question in RM-10209, in Paragraph 40 regarding the advisability of sub-banding within the proposed allocation, I strongly support the concept of protecting narrow band modes such as CW and the increasing array of Digital mode variants from wider bandwidth modes such as SSB. As already noted in paragraph 40, such sub-banding already successfully separates the modes on the two adjacent bands (3500 kHz and 7000 kHz).

Of the proposed 150kHz allocation, I recommend setting aside the upper 100 kHz for wideband (e.g. SSB, etc.) operation, and the lower 50 kHz for narrow bandwidth CW and the increasingly popular Digital mode variants. I also suggest that no further partitioning within the "narrow bandwidth" segment is required.

With regard to partitioning the allocation by license class, queried in paragraph 39, I suggest that the 100 kHz wideband partition be further partitioned by license class, reserving the lowest 25 kHz of that sub-band for holders of Amateur Extra license, with the remaining 75 kHz for use by General and Advanced class licensees, as has been done in the past to encourage "incentive" to upgrade technical competence and license class.